



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SCJ
F. #2013R01203

*271 Cadman Plaza East
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June 6, 2016

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Re: United States v. Discala, et al.
Criminal Docket No. 14-399 (ENV)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. This disclosure supplements the government's earlier disclosures. The government again requests reciprocal discovery.

Please find attached text messages and other information seized from the cell phone of defendant Discala.

Also attached, as a courtesy and an aid in reviewing the electronic data seized from OmniView's offices, is a list of the search terms and the number of documents produced that are responsive to each search term. Please note that this document was created by a legal

Defense Counsel

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assistant who searched each term using Relativity 8 software and the “dtSearch” function, which is slightly more inclusive than a “Keyword Search.”

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

ROBERT L. CAPERS
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Cc: Clerk of Court (ENV) (by ECF w/o attachments)